MPS Ref. No.: IBMK10042

REMARKS

This is intended as a full and complete response to the Office Action dated October 6, 2004, having a shortened statutory period for response set to expire on January 6, 2005. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-31 are pending in the application. Claims 1-8, 10-13, 15-19, 21-28, and 30-31 remain pending following entry of this response. Claims 1, 4, 8, 13, 15, 17, 19, 21, 24, and 28 have been amended. Figure 3 has been amended to correct a minor typographical error. Applicant submits that the amendments do not introduce new matter.

Claim Rejections - 35 USC § 102

Claims 1-7, 10, 15-18, 21-27 and 30 are rejected under 35 U.S.C. 102(e) as being anticipated by *Hachamovitch et al.* (USPN 6,377,965 B1, hereinafter *Hachamovitch*).

Applicant respectfully traverses this rejection.

Regarding claims 1, 15, and 21, *Hachamovitch* discloses a word completion method that displays a suggested completion for a partial entry based on matches between "a partial data entry and entries in a word completion list." *Hachamovitch*, 4:10-20. The suggested completions rely on word completion lists that may be different "for different application programs, and for different data files within the same application program." *Hachamovitch*, 4:28-30. The word completion system of *Hachamovitch* provides "a user interface allows the user to customize each suggestion list with user defined name completion pairs" that may be tied to "dynamic parameters maintained by the computer system" or to "name-completion pairs that are tied to contextual information, such as structured data fields or context labels assigned manually or by a document-creation aid known as a wizard." *Hachamovitch*, 4:37-52. Thus, the word completion entries are available either from a predefined list that a user

may modify, or from system parameters such as date, time, or other environment variables.

In contrast, Applicant claims providing context sensitive code ahead input to a user of a software development application wherein the code ahead input is identified not from a predefined suggestion list; but rather, from a predefined definition of the programming construct contained in the source code. That is, the code ahead input provided to a user relies not just on a pre-existing name-value pair as taught by *Hachamovitch*, but on the definition of the programming construct in the source code.

Regarding claims 2-7, 10, 16-18, 22-27 and 30, each of theses claims depends from one of independent Claims 1, 15, or 21. Because Applicant believes to have traversed this rejection regarding independent Claims 1, 15 and 21, Applicant asserts that the rejection as applied to these dependent claims is also traversed without the need for further remarks.

Therefore, Applicant submits that claims 1-7, 10, 15-18, 21-27 and 30 are patentable over *Hachamovitch*. Withdrawal of the rejection is respectfully requested.

Claim Rejections - 35 USC § 103

Claims 8, 19 and 28 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Hachamovitch*, further in view of *Lin* (USPN 6,381,597 B1).

Applicant respectfully traverses this rejection.

Regarding claims 8, 19, and 28, each of these claims depends from one of independent claims 1, 15, and 21. To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). See also MPEP § 2143.03. Because *Hachamovitch* fails to teach, providing context sensitive code ahead input to a user of a software development application wherein the code ahead input is identified

from a from the definition of the programming construct in the source code, Applicant asserts that the combination of *Hachamovitch* and *Lin* fails to establish a *prima facie* case of obviousness as to claims 8, 19, and 28.

Therefore, Applicant submits that claims 8, 19, and 28 are patentable over *Hachamovitch*, further in view of *Lin*, and respectfully requests that the rejection be withdrawn.

Claims 11-13 and 31 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Hachamovitch*, further in view of *Comer et al.* (USPN 5,845,300, hereinafter *Comer*).

Applicant respectfully traverses this rejection.

Regarding claims 11-13 and 31, each of these claims depends from one of independent claims 1 and 21. Because *Hachamovitch* fails to teach, providing context sensitive code ahead input to a user of a software development application wherein the code ahead input is identified from a from the definition of the programming construct in the source code, Applicant asserts that the combination of *Hachamovitch* and *Comer* fails to establish a *prima facie* case of obviousness as to claims 11-13 and 31.

Therefore, Applicant submits that claims 11-13 and 31 are patentable over *Hachamovitch*, further in view of *Comer*. Withdrawal of the rejection is respectfully requested.

Claims 9, 14, 20, and 29 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Hachamovitch*, further in view of *Hungerford et al.* (USPN 4,872,112). Applicant has cancelled claims 9, 14, 20, and 29.

Conclusion

The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicant's disclosure than the primary references cited in the office action. Therefore, Applicant believes that a detailed discussion of the secondary references is not necessary for a full and complete response to this office action.

Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully requests that the claims be allowed.

Respectfully submitted,

Randol W. Read

Registration No. 43,876

MOSER, PATTERSON & SHERIDAN, L.L.P.

3040 Post Oak Blvd. Suite 1500

Houston, TX 77056

Telephone: (713) 623-4844 Facsimile: (713) 623-4846

Attorney for Applicant

PATENT Atty. Dkt. No. ROC920010042US1 MPS Ref. No.: IBMK10042

IN THE DRAWINGS:

The attached sheet of drawings includes changes to Fig. 3.